

CORRESPONDENCE CONTROL
INCOMING LTR NO

00714 RFOL

DUE DATE
ACTION

Department of Energy

ROCKY FLATS FIELD OFFICE
10808 HIGHWAY 93, UNIT A
GOLDEN, COLORADO 80403-8200

OCT 29 2001

RECEIVED

2001 OCT 30 A 10:03

CORRESPONDENCE
CONTROL

01-DOE-02003

Mr Kerrigan Clough, Assistant Regional Administrator
U S Environmental Protection Agency, Region 8
999 18th Street, Suite 300
Denver, Colorado 80228

Dear Mr Clough

The Rocky Flats Environmental Technology Site (Site) requests a decision regarding the disposition of dried paints containing non-liquid Polychlorinated Biphenyls (PCB). The closure of the Site will require the demolition of numerous concrete structures, many of which are painted with PCB paint. The technical basis for this request was provided to your staff in the report titled "Risk-Based Approach for Polychlorinated Biphenyls -Based Painted Concrete," dated July 19, 2001. This report, which incorporates the risk-based approach described in 40 CFR 761.62(c), clearly shows that leaving the PCB-painted concrete on site will not pose an unreasonable risk to health or the environment.

We request that the disposition decision acknowledge that this material is inert and therefore the concrete rubble may be left on site.

- 1 as backfill for the building being demolished that is the source of this material, or
- 2 may be stockpiled and be left onsite as backfill in accordance with the "Rocky Flats Cleanup (RFCA) Agreement Standard Operating Protocol (RSOP) for Recycling Concrete."

Dust control measures that will be employed during the demolition of concrete structures are described in the RFCA Standard Operating Protocol for Facility Disposition.

Finally, the Department of Energy anticipates that once the PCB-painted material is integrated into the final land configuration at the Site, the Integrated Monitoring Plan (IMP) may need to be revised to include ground water monitoring for PCBs. Such revisions will be made as part of the annual review of the IMP performed by the Site at the beginning of each fiscal year of consultation with the Environmental Protection Agency and the Colorado Department of Public Health and Environment.

Sincerely,

Joseph A. Legare
Assistant Manager
for Environment and Stewardship



Reviewed for Addressee
Corres Control RFP

0/30/01 By *leg*

Ref Ltr #

CC
R DiSalvo, RFFO, DOE
D Shelton, K-H
C Deck, K-H

OE ORDER #

NONE

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD

IA-A-000996